

MEMO ENDORSED

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REQUEST FOR TIME EXTENSION

March 20, 2019

VIA ECF and Email to Abrams_NYSDChambers@nysd.uscourts.gov

The Honorable Justice Ronnie Abrams
US District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom: 1506
New York, NY 10007

Re: *Asensio et al. v. DiFiore et al.*, no. 1:18-cv-10933-RA

Dear Judge Abrams:

I am the self-represented Plaintiff in the above referred case. The Plaintiff requests a 30 day extension to file his reply to the defendants' motions to dismiss. The State Defendants have authorized me to represent to the Court that they take no position. Defendant Emilie Marie Bosak finally replied at 12:44 P.M. today that she would not agree to the extension.

The defendants' memorandums of law are combined together 72 pages long. They apply 170 legal authorities to 13 legal different arguments. Among the authorities are 20 purported legal decisions in the state case. These do not include the 8 decisions from the Court of Appeals, or the administrative proceedings directly with the Administrative Board of the Courts and chief judge, governor and state attorney, and New York's Judicial Institute, Ethics Advisory Committee and Commission on Judicial Conduct. Neither do they include the constitutional litigation in the Supreme Court's matrimonial and civil parts nor 17 decisions at the Appellate Division.

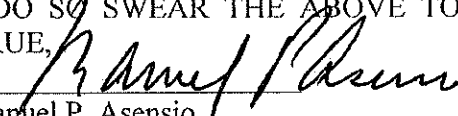
The Plaintiff does his own legal research and analysis, and writing. The defendants has notice of the Plaintiff federal complaint for over 6 months before it was filed and 87 days to formulate their motions to dismiss. The Plaintiff is employed full time, is not a lawyer, is dealing with other issues related to his daughter and this case, and other legal matters, and has only had the defendants' motion to dismiss for 35 days.

Among the other legal matters is a action by a NYSE listed public company against a group of short sellers. The Plaintiff is not involved with any investment activities including short selling. However, he must defend himself in this complicated securities case. The NYSE company and the other defendants have highly experienced top their law firms representing them. The Plaintiff is represented by a sole general practitioner with no experience in securities or first amendment

litigation. As a result, this other legal case has created additional daily burdens on the Plaintiff throughout this year.

The Plaintiff is being denied his inalienable parental rights, and constitutional freedoms and liberties. He is being precluded from any process in the state in the matter. Many reasonable persons would agree the defendants' hostility towards the Plaintiffs and legal fabrications are prima facie evidence of their malice and ill will. This case presents unprecedented federal issues. The defendants will not be prejudiced by the extension at all. The Plaintiff respectfully request a 30 day extension.

I DO SO SWEAR THE ABOVE TO BE
TRUE,


Manuel P. Asensio
Plaintiff

Distribution:

Emilie Marie Bosak

The Honorable New York State Attorney General Letitia James, Chief of Staff and Deputy State Attorney General Attorney, Brian K. Mahanna, tasha.bartlett@ag.ny.gov

The Honorable Governor Andrew M. Cuomo, Governor's Chief Counsel and Principal Legal Advisor, Alphonso David, alphonso.david@exec.ny.gov

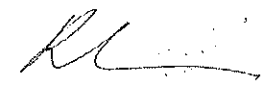
The Honorable Chief Judge Janet M. DiFiore, ucs-correspondence@nycourts.gov, Head of the Office of Court Administration, John W. McConnell, lcgreen@nycourts.gov

Jonathan D. Conley, Esq., jonathan.conley@ag.ny.gov

Rachel Ambats, Esq., rachel.ambats.esq@gmail.com

Application granted.

SO ORDERED.


Ronnie Abrams, U.S.D.J.
March 20, 2019